

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

2 DAVID R. CALLAWAY (CABN 121782)
3 Chief, Criminal Division

4 DEBORAH R. DOUGLAS (NYBN 2099372)
5 Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102
Telephone: (415) 436-7200
Facsimile: (415) 436-7234
E-Mail: deborah.r.douglas@usdoj.gov

8 Attorneys for the United States of America

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA) CR 14-527 RS
14 v.)
15 ALLEN FONG,) STIPULATION AND [PROPOSED] ORDER FOR
16 YA HUAI HUNG,) A CONTINUANCE AND EXCLUSION OF TIME
17 JIE MU,) UNDER THE SPEEDY TRIAL ACT, 18 U.S.C.
18 LAURENCE SHU KWAN LEE,) § 3161 ET. SEQ
19 KEVIN HARTIG,)
WAYLEN FONG,)
ANGELINA CHUONG, and)
CHONTHICHA JAEMRATANASOPHIN,)
Defendants.)

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22 The United States of America, by and through its attorney of record, and the above-captioned
23 defendants ("defendants"), by and through their respective attorneys of record, hereby stipulate as
24 follows:

25 1. For the reasons stated in open court on May 24, 2016, the Court continued the above-
26 captioned matters to July 26, 2016 at 2:30 p.m. and excluded time under the Speedy Trial Act from May
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1 24, 2016 through July 26, 2016 based upon effective preparation of counsel under 18 U.S.C.
2 §§3161(h)(7)(A) and (B)(iv).

3 2. The parties stipulate and agree that this matter should be continued to July 26, 2016 at
4 2:30 p.m., and that the failure to grant such a continuance would unreasonably deny the defendants the
5 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6 The parties further stipulate and agree that the time from May 24, 2016 through July 26, 2016 should be
7 excluded based upon the complexity of the case in accordance with the provisions of the Speedy Trial
8 Act, 18 U.S.C. § 3161(h)(7)(B)(ii), and on the basis that the ends of justice are served by taking such
9 action which outweigh the best interest of the public and the defendants in a speedy trial and for
10 effective preparation of counsel, taking into account the exercise of due diligence, under 18 U.S.C.
11 § 3161(h)(7)(A) and (B)(iv).

10 | P A T E D 15-25-2011

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

[Signature]
DEBORAH R. DOUGLAS
Assistant United States Attorney

/s/
GALIA AMRAM, Esq.
Attorney for Defendant Allen Fong

/s/
ROBERT WAGGENER & RICHARD
HULLINGER, Esqs.
Attorney for Defendant Ya Huai Hung

/s/
MARK GOLDROSEN, Esq.
Attorney for Defendant Jie Mu

/s/
ALAN DRESSLER, Esq.
Attorney for Defendant Laurence Shu
Kwan Lee

/s/
SETH CHAZIN, Esq.
Attorney for Defendant Kevin Hartig

/s/
GILBERT EISENBERG, Esq.
Attorney for Defendant Wavlen Fong

/s/
ALEXANDRA McCLURE, Esq.
Attorney for Defendant Angelina Chuong

/s/
SCOTT SUGARMAN, Esq.
Attorney for Defendant Chonthicha
Jaemratanasophin

ORDER

Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that the above-captioned matters shall be continued to July 26, 2016 at 2:30 p.m. and that the time from May 24, 2016 through July 26, 2016 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(B)(ii), and 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that (A) the above-captioned matters are complex based upon the nature of the prosecution; (B) failure to grant the continuance would unreasonably deny the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence; and (C) the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

DATED: May 25, 2016


HONORABLE RICHARD SEBORG
UNITED STATES DISTRICT JUDGE